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Attorneys for Plaintiff, Wells Fargo Bank, N.A. as Trustee for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates, Series 2005-WC2

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**WELLS FARGO BANK, N.A. AS TRUSTEE
FOR PARK PLACE SECURITIES, INC.
ASSET-BACKED PASS-THROUGH
CERTIFICATES, SERIES 2005-WCW2.**

Plaintiff.

vs.

FIDELITY NATIONAL TITLE GROUP,
INC.; FIDELITY NATIONAL TITLE
INSURANCE COMPANY; LAND TITLE OF
NEVADA, INC.; DOE INDIVIDUALS I
through X; and ROE CORPORATIONS XI
through XX, inclusive.

Defendants.

Case No.: 2:20-cv-02156-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
17 & 19]**

[First Request]

Plaintiff Wells Fargo Bank, N.A. as Trustee for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates, Series 2005-WCW2 (“Wells Fargo”), Specially-Appearing Defendant Fidelity National Title Group (“Fidelity”) and Defendant Fidelity National Title Insurance Company (“FNTIC”) (collectively, “Defendants”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On November 24, 2020, Wells Fargo filed its Complaint in Eighth Judicial District Court, Case No. A-20-825267-C [ECF No. 1-1];

- 1 2. On November 24, 2020, FNTIC filed its Petition for Removal to this Court [ECF
- 2 No. 1];
- 3 3. On January 19, 2021, FNTIC filed a Motion to Dismiss [ECF No. 17];
- 4 4. On January 20, 2021, Fidelity filed a Motion to Dismiss [ECF No. 19];
- 5 5. Wells Fargo's deadline to respond to FNTIC's Motion to Dismiss is currently
- 6 February 2, 2021 and Wells Fargo's deadline to respond to Fidelity's Motion to
- 7 Dismiss is currently February 3, 2021;
- 8 6. Wells Fargo's counsel is requesting an extension until March 3, 2021, to file its
- 9 response to the pending Motions to Dismiss;
- 10 7. This extension is requested to allow Wells Fargo additional time to finalize and file
- 11 its response to the pending Motions to Dismiss as lead handling counsel for Wells
- 12 Fargo continues to recover from an unexpected medical emergency.
- 13 8. Counsel for Defendants do not oppose the requested extension;

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1 9. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 2 nd day of February, 2021. 5 WRIGHT, FINLAY & ZAK, LLP 6 <u>/s/ Lindsay D. Robbins, Esq.</u> 7 Darren T. Brenner, Esq. 8 Nevada Bar No. 8386 9 Lindsay D. Robbins, Esq. 10 Nevada Bar No. 13474 11 7785 W. Sahara Ave., Suite 200 12 Las Vegas, NV 89117 13 <i>Attorneys for Plaintiff, Wells Fargo Bank, 14 N.A. as Trustee for Park Place Securities, Inc. 15 Asset-Backed Pass-Through Certificates, 16 Series 2005-WCW2</i>	17 DATED this 2 nd day of February, 2021. 18 SINCLAIR BRAUN LLP 19 <u>/s/ Kevin S. Sinclair, Esq.</u> 20 Kevin S. Sinclair, Esq. 21 Nevada Bar No. 12277 22 16501 Ventura Boulevard, Suite 400 23 Encino, California 91436 24 <i>Attorney for Defendants, Fidelity National 25 Title Group, Inc. and Fidelity National Title 26 Insurance Company</i>
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14 **IT IS SO ORDERED.**

15 Dated this 2nd day of February, 2021.

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18 UNITED STATES DISTRICT JUDGE

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